



September 16, 2024

VIA ECF

Hon. Victoria Reznik, USMJ
United States District Court
for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Galvan v. Rolling Lawns, Inc. et al.*, Case No. 7:23-cv-06724(CS)(VR)

Dear Judge Reznik,

Pursuant to your Honor's Order at the last status conference on September 4, 2023, the parties held a meet and confer, and are now jointly submitting a status update and a proposed revised Case Management Plan (below).

Defendants will extract responsive documents and communications from Defendants' cell phones and computers, and make an initial ESI production by Friday, September 20, 2024.

Plaintiff's counsel has agreed to provide Defendants with a workers compensation authorization.

The parties will soon schedule depositions with the expectation that fact discovery will be completed by mid-November.

Respectfully submitted,

/s/ Randi Cohen

Randi Cohen
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Attorneys for Plaintiff

/s/ Steven Moser

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEPAMUCENO GALVAN,

Plaintiff,

v.

ROLLING LAWNS, INC., *et al.*,

Defendants.

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) Civil Action No. 23-CV-6724
) Hon. Cathy Seibel
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SUPPLEMENTAL CASE MANAGEMENT PLAN

1. Fact Discovery to be completed by November 15, 2024
2. Depositions to be completed by December 2, 2024
3. Requests to Admit and any further Interrogatories to be served by December 16, 2024
4. All fact discovery to be completed by January 15, 2025
5. All expert discovery to be completed by February 14, 2025

SO ORDERED

Dated _____

White Plains, New York

Hon. Victoria Reznik, U.S.M.J.